

4823-8689-3814/SCS/8.17.21/km

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

ATAIN SPECIALTY INSURANCE  
COMPANY,  
Plaintiff

v.

TRIPLE PG SAND DEVELOPMENT,  
LLC.  
Defendant

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CASE NO. 4:21-CV-2122

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO  
RESPOND TO PLAINTIFF'S ORIGINAL COMPLAINT**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW **TRIPLE PG SAND DEVELOPMENT, LLC, ("Triple PG")**

Defendant herein, and files this Motion for an Extension of Time to Respond to Plaintiff's Original Complaint, and would show the following:

**I.**

Plaintiff's counsel, George T. Jackson, and counsel for Triple PG have agreed by email conversation on August 6, 2021 that Plaintiff will grant an extension of time until Monday, August 30, 2021 for the response of Triple PG in this cause of action.

WHEREFORE, PREMISES CONSIDERED, Defendant **Triple PG Sand Development, LLC** prays that the Court take notice of this Motion and the agreement between counsel to extend deadline for Defendant **Triple PG Sand Development** to respond to Plaintiff's Original Complaint until Monday, August 30, 2021, and grant its Order requesting the same.

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Respectfully submitted,

/s/ Scott C. Skelton

Scott C. Skelton

State Bar No. 00784979

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***Attorneys for Defendant JML Management, Inc.***

### **CERTIFICATE OF CONFERENCE**

On the 6th day of August, 2021, Counsel for Triple PG has conferred with Counsel for Plaintiff who advised he is unopposed to this motion.

/s/ Scott C. Skelton

Scott C. Skelton

### **CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing instrument was served electronically via *U.S. District Court [LIVE ] Document Filing System* to all known counsel of record, on this 18<sup>th</sup> day of August, 2021.

/s/ Scott C. Skelton

Scott C. Skelton